

Exhibit A



**Service of Process
Transmittal**

10/02/2020

CT Log Number 538339982

TO: Sue Carlson
Target Corporation
1000 Nicollet Mall
Minneapolis, MN 55403-2542

RE: Process Served in New Jersey

FOR: Target Corporation (Domestic State: MN)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: SAVONIA WADE, Pltf. vs. TARGET, et al., Dfts. // To: TARGET CORPORATION

DOCUMENT(S) SERVED: -

COURT/AGENCY: None Specified
Case # ESXL00513820

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition

ON WHOM PROCESS WAS SERVED: The Corporation Trust Company, West Trenton, NJ

DATE AND HOUR OF SERVICE: By Process Server on 10/02/2020 at 15:01

JURISDICTION SERVED : New Jersey

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 10/05/2020, Expected Purge Date: 10/10/2020

Image SOP

Email Notification, Non Employee Litigation Target gl.legal@target.com

SIGNED: The Corporation Trust Company
ADDRESS: 1999 Bryan St Ste 900
Dallas, TX 75201-3140

For Questions: 877-564-7529
MajorAccountTeam2@wolterskluwer.com

Almonacy Law Firm
 Pierre Emmanuel Almonacy, Esq.
 1466 Morris Avenue,
 Union, NJ 07083
 (908) 688-5500

ATTORNEY FOR THE PLAINTIFF

SAVONIA WADE

Plaintiff

-v-

TARGET, ET AL

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION
 Essex COUNTY
 DOCKET NO.: ESX-L-005138-20

CIVIL ACTION

SUMMONS

FROM THE STATE OF NEW JERSEY TO: TARGET CORPORATION

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey, and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages, or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

/s/ Michelle M. Smith

Michelle M. Smith,
 Clerk of the Superior Court

DATED: October 1, 2020

Name of the Defendant(s) to be served: TARGET CORPORATION

Address of the Defendant(s) to be served: C/O CORPORATION TRUST COMPANY, RA, 820 BEAR TAVERN
 ROAD, WEST TRENTON, NJ 08618

ALMONACY LAW FIRM

PIERRE EMMANUEL ALMONACY - Attorney ID: 042832000

1466 Morris ave

Union, NJ 07083

Phone: (908) 688-5500

Fax: (908) 688-5019

Email: palmonacy@almonacylawfirm.com

Attorney(s) for Plaintiff

SAVONIA WADE,

Plaintiff,

Vs.

TARGET, TARGET CORPORATION, JOHN
DOE (A FICTITIOUS NAME AND ABC
XYZ (A SERIES OF FICTITIOUS NAMES)

Defendant

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
ESSEX COUNTY
DOCKET NO.:

CIVIL ACTION

AMENDED COMPLAINT AND JURY
DEMAND

Plaintiff Savonia Wade, complaining against Defendant, deposes and says:

PARTIES

1. Plaintiff Savonia Wade, resides at 483 Valley Road, #2R, in the City of West Orange, County of Essex, State of New Jersey.
2. Defendant Target, whose primary business address is 100 14th Street, in the City of Jersey City, County of Hudson, State of New Jersey.
3. Defendant Target Corporation, whose primary business address is 1000 Nichollet Mall, in the City of Minneapolis, County of Hennepin and State of Minnesota.
4. Fictitious Party, designated as John Doe, whose identity are unknown to the Plaintiff, are who owned, occupied, and/or operated the property located at 100 14th Street, in the City of Jersey City, County of Hudson, State of New Jersey.

5. Fictitious Parties, designated as ABC-XYZ, whose identities are unknown to the Plaintiff, are who owned, occupied, and/or operated the property located at 100 14th Street, in the City of Jersey City, County of Hudson, State of New Jersey.

FACTS COMMON TO ALL COUNTS

1. On or about August 1, 2018, Plaintiff was lawfully on the premises known as, Target, located at 100 14th Street, in the City of Jersey City, County of Hudson, State of New Jersey.
2. The aforementioned Defendants owned, occupied, operated and/or maintained the subject premises.
3. The aforementioned Defendants were responsible for the care and maintenance of the subject premises.
4. On or about August 1, 2018, there existed a hazardous and dangerous condition on the subject property in the form of "water like or wax like substance or glue like substance" that was left on the floor of the premises by the aforementioned Defendants.
5. Due to the hazardous conditions, Plaintiff suffered both serious and permanent injuries.

FIRST COUNT
NEGLIGENCE

6. Plaintiff hereby reasserts and re-alleges the statements made in Paragraphs 1-5 as "the facts".

7. On August 1, 2018, Plaintiff was legally and lawfully upon the premises of Defendant, Target, located at 100 14th Street, in the City of Jersey City, County of Hudson, State of New Jersey.
8. At the time and place aforesaid, the subject premises was owned, operated, controlled, inspected, maintained and/or repaired by the Defendants, through their agents, servants or employees.
9. The Defendants, Target, Target Corporation, John Doe, and ABC-XYZ were responsible for the care and maintenance of the subject premises.
10. At the above time and place, Defendants, through their agents, servants or employees owed to Plaintiff and others lawfully using the premises, the duty to use reasonable care to maintain and keep the premises in a safe condition, free from any defects, foreign substances, or other deleterious matter and impediments, which might cause injury to Plaintiff.
11. In violation of this duty, Defendants, through their agents, servants or employees, negligently, carelessly and in disregard of this duty, permitted the premises to become and remain in an unsafe condition and in such a manner as to create a nuisance and to render the premises unsafe for persons lawfully thereon, including Plaintiff, who was caused to fall causing serious personal injuries.
12. Defendants were negligent in that they:
 - a. Did not keep the premises in a safe condition;
 - b. Did not exercise proper care;
 - c. Caused a dangerous condition to exist;
 - d. Allowed a nuisance to exist;

- e. Failed to provide proper safeguards and/or warnings on the property;
- f. Failed to provide safe and clear access for persons allowed upon and invited to use the property;
- g. Failed to keep the property free and clear of any dangerous substances;
- h. Was otherwise negligent in the maintenance of the premises

13. As a direct and proximate result of the negligence of the Defendants, Target, Target Corporation, John Doe, and ABC-XYZ, in the ownership, operation, control, maintenance, inspection, and/or repair of the subject premises, the Plaintiff was caused to sustain severe, serious and permanent injuries. Plaintiff was cause to suffer great pain and anguish and will in the future be cause to suffer great pain and anguish; she was caused to lose time from her employment and will, in the future, be caused to lose time from her employment; she was caused to incur medical expenses and will, in the future be caused to incur medical expenses; she has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

WHEREFORE, Plaintiff, demands judgment against the Defendants Target, Target Corporation, John Doe, and ABC-XYZ, jointly, severally or in the alternative in the amount of their damages together with interest and costs of suit.

SECOND COUNT

("Fictitious Doe and ABC-XYZ Defendants")

14. Plaintiff hereby reasserts and re-alleges the statements made in Paragraphs 1-5, as "the facts".

15. At the aforesaid time and place, Defendant, John Doe, and ABC-XYZ were an unknown person or persons whose actions causes and/or contributed, directly or indirectly to the

incident herein and the injuries and damages suffered by Plaintiff, Savonia Wade.

16. As a direct and proximate result of the negligence of the Defendants, Target, Target Corporation, John Doe, and ABC-XYZ, in the ownership, operation, control, maintenance, inspection, and/or repair of the subject premises, the Plaintiff was caused to sustain severe, serious and permanent injuries. Plaintiff was cause to suffer great pain and anguish and will in the future be cause to suffer great pain and anguish; she was caused to lose time from her employment and will, in the future, be caused to lose time from her employment; she was caused to incur medical expenses and will, in the future be caused to incur medical expenses; she has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

WHEREFORE, Plaintiff, demands judgment against the Defendants Target, Target Corporation, John Doe, and ABC-XYZ, jointly, severally or in the alternative in the amount of their damages together with interest and costs of suit.

Dated: August 5, 2020

ALMONACY LAW FIRM
Attorney(s) for Plaintiff

By:


PIERRE EMMANUEL ALMONACY